

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BRAYAN ANGULO, CAMERON PILLE,  
JANINA SALORIO, and XANDER BLACK,  
individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

v.

CLOWNS.COM, INC., ADOLPH  
RODRIGUEZ a/k/a George Rodriguez a/k/a  
George Adolph Rodriguez a/k/a George  
Blackstone, and ERICA BARBUTO,

*Defendants.*

Civ. Action No.: 23-cv-10983 (GS)

**STIPULATION OF DISMISSAL**

IT IS HEREBY STIPULATED AND AGREED, by and among all 12 Plaintiffs and all Defendants that, pursuant to the terms of a Satisfaction Agreement covering all federal claims, which have been brought in this civil action solely under the Fair Labor Standards Act (“FLSA”) by nine (9) Plaintiffs (Brayan Angulo, Miles Sullivan, Cara Stofa, Yasmine Elabd, Matthew Tierney, Will Pierson, Lia Hauser, Grayson Hampshire, and Isabella Marinucci – collectively, the “FLSA Plaintiffs”) against the Defendants, the FLSA claims of the FLSA Plaintiffs are hereby dismissed with prejudice, upon being so-ordered by this Court, with no award of counsel fees or costs by the Court to either side, except as provided in the parties’ Satisfaction Agreement; and

IT IS FURTHER STIPULATED AND AGREED, that the remaining claims by the nine FLSA Plaintiffs under state law, and all of the claims of the remaining three (3) Plaintiffs

(Cameron Pille, Janina Salorio, and Xander Black), each and all of which claims have been brought exclusively under state law, are hereby dismissed without prejudice, upon being so-ordered by this Court, so that they may be re-filed by all 12 plaintiffs in the Supreme Court of the State of New York for Nassau County.

Dated: New York, New York

May 28, 2024

Plaintiffs Brayan Angulo, Cameron Pille,  
Janina Salorio, Xander Black, Miles Sullivan,  
Cara Stofa, Yasmine Elabd, Matthew Tierney,  
Will Pierson, Lia Hauser, Grayson  
Hampshire, and Isabella Marinucci

Defendants Clowns.com, Inc., Adolph Rodriguez,  
and Erica Barbuto

By:



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*Counsel for Plaintiffs*

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*Counsel for Defendants*

So Ordered: \_\_\_\_\_ Dated: \_\_\_\_\_, 2024  
Gary Stein, U.S.M.J.